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AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

JOHN CHRISTOPHER COLLETTI

Case: 2:20-mj-30255

Judge: Unassigned,

Case No. Filed: 07-17-2020

USA v. SEALED MATTER (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 26, 2019 - May 27, 2019 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. §1343

Wire Fraud

18 U.S.C. §1029

Fraud and Related Activity in Connection with Access Devices

18 U.S.C. §1028A

Aggravated Identity Theft

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

Julia MacBeth, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence
 and/or by reliable electronic means.


*Judge's signature*Date: July 17, 2020City and state: Detroit, MI

Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A COMPLAINT

I, Julia MacBeth, Special Agent for the Federal Bureau of Investigations,
being duly sworn, state as follows:

INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent of the FBI and, as such, an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code.
2. I have been employed by the FBI since May 2016. Prior to joining the FBI, I was a Federal Air Marshal from December 2010 until April 2016. I earned a Bachelor's degree in criminal justice from Western Michigan University and a Master's degree in criminal justice from Tiffin University. I have received law enforcement training at the Federal Law Enforcement Training Center (FLETC) and the FBI Academy. During my employment with the FBI, I have investigated federal crimes involving mail fraud, wire fraud, money laundering, investment fraud, identity theft, and various other criminal matters. At all times during the investigation described in this affidavit, I have been acting in an official capacity as a Special Agent of the FBI.

PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a criminal complaint and arrest warrant for JOHN CHRISTOPHER COLLETTI of violations of Title 18, U.S.C. §1343 (Wire Fraud); Title 18, U.S.C. §1029 (Fraud and Related Activity in Connection with Access Devices); and Title 18, U.S.C. §1028A (Aggravated Identity Theft).
4. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that COLLETTI, a resident of the Eastern District of Michigan, is responsible for knowingly possessing and using counterfeit access devices, and using victims' personal identifying information (PII) to execute a scheme to defraud within the Eastern District of Michigan, and elsewhere. There is also probable cause to believe that this scheme involved the interstate transmission of information via wire.
5. This affidavit is submitted for securing a criminal complaint and arrest warrant; therefore, this affidavit does not contain every fact that I have learned during the course of the investigation. I have only set forth the facts necessary to establish probable cause to believe that COLLETTI violated the statutes identified above. The information contained in this affidavit is based upon my personal knowledge, training and experience, as well as the

combined knowledge, training and experience of other law enforcement officers and agents with whom I have had discussions.

6. Title 18, U.S.C. § 1343 criminalizes the transmission (or causing the transmission) of any writing, signal, or sound by means of a wire, radio, or television communication in interstate commerce for the purpose of executing or attempting to execute any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises.
7. Title 18, U.S.C. §1029(a)(3) criminalizes possessing fifteen or more devices which are counterfeit or unauthorized access devices knowingly and with intent to defraud. An access device is defined as any card, account number, personal identification number, or other means of account access that can be used, alone or in conjunction with another access device, to obtain money, goods, services, or other things of value, or can be used to initiate a transfer of funds. A counterfeit access device means any access device that is counterfeit, fictitious, altered, or forged.
8. Title 18, U.S.C. §1028A criminalizes knowingly transferring, possessing, or using, without lawful authority, a means of identification of another person during the course of certain other felony violations, to include the above described wire fraud.

BACKGROUND

9. This investigation has revealed, as explained in more detail below, that JOHN CHRISTOPHER COLLETTI, operated a scheme to defraud by using counterfeit driver's licenses and illegally obtained PII to make unauthorized e-check withdrawals from Global Payment kiosks (GPK) located inside casinos. COLLETTI targeted VIP Preferred Program casino patrons as victims by purchasing their PII on the internet and then having fraudulent driver's licenses manufactured in the victims' names. Further, COLLETTI frequently dressed in elaborate disguises, to include the use of full prosthetic facemasks, to conceal his identity while using the GPKs to complete monetary withdrawals from the victims' personal bank accounts. For example, the following are two of the disguises utilized by COLLETTI:



10. According to information provided by Global Payments Gaming Services representatives and their website, GPKs are self-service booths catering to the gaming industry that feature ticket exchanges, bill-breaking, jackpot processing, e-check, automated teller machine (ATM) and cash advance

services. To utilize a GPK, casino patrons are required to enroll in Global Payments' VIP Preferred Program in advance and request access with the casino. With the GPK e-check option, after the one-time enrollment process, guests obtain the ability to make withdrawals (cleared the next business day) up to a revolving seven-day limit, from up to four of their own checking accounts. Each patron participating in the VIP Preferred Program would be given varying withdrawal limits on their account, based on factors reviewed during enrollment. GPKs employ multi-factor authentication; to conduct a transaction on a GPK, a patron must first insert their driver's license, and then successfully enter the last four digits of their Social Security Number and the last four digits of their telephone number.

11. Global Payments Gaming Services Inc., located in Las Vegas, Nevada, is a division of Global Payments Inc., which is a company headquartered in Atlanta, Georgia. All GPK transaction settlements are sent to Global Payments' host systems in Atlanta and all secured output files are stored at an operations office in Niles, Illinois. Accordingly, there is probable cause to believe that any business transacted using a GPK inherently requires the interstate communication of information (to include writings, signs, signals, pictures, or sounds) via wire. In other words, a transaction conducted at a GPK in the Eastern District of Michigan would cause interstate wire

communications to Georgia, Illinois, and whichever state the victim-consumer's personal bank is located.

PROBABLE CAUSE

MGM Grand Casino

12. In May 2019, MGM Grand Casino Investigators identified at least ten (10) victims of identity theft at the MGM Grand Casino Detroit between April 26, 2019 and May 27, 2019, for a total loss of approximately \$98,840. The incidents were reported to the Michigan State Police (MSP) Gaming Section who established a common suspect, later identified as COLLETTI, by using closed circuit television (CCTV) footage of the incidents. In each instance, COLLETTI wore an elaborate disguise, including a full prosthetic facemask, to resemble an elderly white male. COLLETTI also used different hats, glasses, and surgical masks to further alter his appearance.
13. One such victim, herein referred to as A.O., reported that large cash withdrawals were made from his bank account, from inside the MGM Grand Detroit Casino on May 23, 2019. Upon further investigation conducted by MSP, it was revealed that on the alleged date, fifteen (15) cash withdrawals, totaling \$30,000, were made at GPKs located inside MGM Grand Detroit using A.O.'s PII, all without A.O.'s knowledge or authorization.

14. Further investigations revealed that on May 23, 2019, COLLETTI was first observed approaching the MGM Grand Detroit Casino on foot wearing a prosthetic mask, blue jacket, dark visor cap, blue jeans and sunglasses on top of his visor cap and carrying a messenger type bag. Then from approximately 5:26 PM to 6:02 PM, COLLETTI made fifteen (15) Global Payment cash transactions—\$2,000 each for a total of \$30,000—at various GPKs inside MGM Grand Casino. After completing the transactions, CCTV footage shows COLLETTI getting into a cab outside of the casino and then being dropped off in the Greektown neighborhood of Detroit. COLLETTI, still in disguise, walked down the street and entered the restroom inside Pegasus Taverna Restaurant, located at 558 Monroe St. Detroit, MI 48226. Approximately ten minutes later, CCTV video outside of the restaurant shows COLLETTI exit the restaurant without the disguise, instead wearing a white T-shirt, blue jeans, dark shoes and carrying a black plastic bag. COLLETTI then got into another taxi and departed the vicinity of the Greektown neighborhood.

15. In each instance of identity theft reported by the MGM Grand Casino Detroit, COLLETTI inserted a counterfeit driver's license for the victim into the GPK. Then COLLETTI would look at a piece of paper, likely containing the victims last four digits of the patron's Social Security Number and the

last four digits of the patron's telephone number, which were needed to complete the transactions. COLLETTI made multiple withdrawals from various GPKs at different locations on the MGM gaming floor in apparent attempts to evade the casino's reporting requirements for withdrawing large amounts of cash at one time.

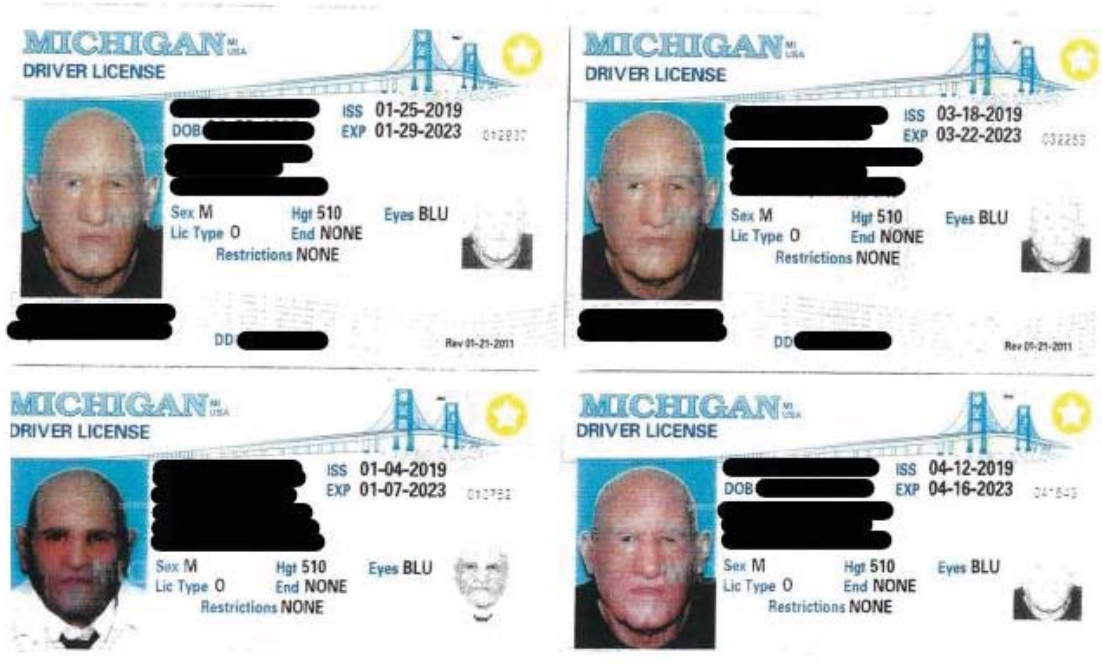
16. The victims were contacted and each stated that they did not authorize any of the above referenced transactions. Each victim had previously enrolled and requested access to use the GPKs at the casino, which caused their bank account(s) to be linked to their VIP Preferred profile.

Prairie Band Casino

17. On March 12, 2020, COLLETTI was arrested for identity theft by Prairie Band Potawatomi Tribal Police at the Prairie Band Casino and Resort in Mayetta, Kansas. Prairie Band Casino surveillance observed that an individual dressed as an elderly white male wearing a straw hat, glasses, and using a mobility walker (later identified as COLLETTI), had made over \$20,000 in cash withdraws from GPKs inside the casino. Casino security approached COLLETTI and asked that he go to the cashier's cage, since he had withdrawn over \$20,000 and his social security number was needed for reporting purposes. COLLETTI immediately went to the restroom, where he

removed his disguise. COLLETTI then exited the casino with a noticeable bulge down the front of his pants, believed to be the prosthetic face mask.

18. After COLLETTI left the Prairie Band Casino, casino security located a pile of clothes, a mobility walker, a Nissan car key, two (2) State of Michigan driver's licenses, and approximately \$11,000 cash in the casino restroom COLLETTI had entered. The driver's licenses were in the name of victims, herein known as J.D and C.K. The driver's licenses were confirmed to be in the names and addresses of true Michigan residents; however, the photos were altered, meaning that the driver's licenses were counterfeit. The photos appeared to be an individual wearing a prosthetic face mask (see below photo for copies of the fraudulent driver's licenses seized at the time of arrest.) The driver's licenses also had sticky notes stuck to the back of the cards containing the victims' social security number and telephone number, which were needed to complete the GPK transactions.



19. When COLLETTI was approached by the police, he identified himself as JOHN COLLETTI. After the police officers placed COLLETTI under arrest, a search of his person incident to arrest was conducted. Located in COLLETTI's pockets were two more State of Michigan driver's licenses in two other victim's names. The photos on these driver's license matched the photos found on the driver's licenses for victims J.D and C.K., that were previously discovered inside the casino restroom. These new driver's licenses were also confirmed to be counterfeit. In addition, \$16,000 in cash, a pair of glasses, and a Prairie Band Casino voucher for \$5.20 were all in COLLETTI's pockets.
20. The following morning, March 13, 2020, a K9 deputy with the Prairie Band Potawatomi Tribal Police Office, located the elderly male prosthetic

facemask believed to have been worn by COLLETTI while he was inside the casino, laying near a light pole in close proximity to the casino.

21. Victims J.D and C.K., both residents of the Eastern District of Michigan, were contacted by officers and made aware of the compromise of their PII. Victim J.D. confirmed he had registered his driver's license to the Global Payments system at the MGM Grand Casino in Detroit prior to the March 12, 2020, arrest of COLLETTI. Victim C.K. advised he was also enrolled in the Global Payments system and gambled only at MGM Grand Casino Detroit. A review of GPK transactions revealed that on March 12, 2020, COLLETTI had withdrawn \$26,000 from J.D's personal bank account and \$500 from C.K's personal bank account via e-check transactions, without either victim's knowledge or authorization.

22. According to a Special Agent (SA) at the FBI Kansas City- Topeka Field Office, Prairie Band Potawatomi Tribal Police Officers contacted the FBI Kansas City- Topeka Field Office to make them aware of crimes committed by COLLETTI. The FBI agreed to assist in the investigation. According to the FBI, Global Payment investigators were aware of the May 2019 instances of identity theft at the MGM Grand Casino and noticed the similarities to the crimes committed by COLLETTI at Prairie Band Tribal Casino. MSP officers were contacted by the Prairie Band Potawatomi Tribal Police and

confirmed that COLLETTI's picture matched the previously-unidentified subject of MSP's identity theft investigation.

23. A search warrant was obtained and executed by Prairie Band Potawatomi Tribal Police on the Nissan Versa, Oklahoma license plate ICV528, which COLLETTI had identified as his rental vehicle. The Nissan key discovered by Prairie Band Casino Security inside the casino restroom unlocked the vehicle. Inside the vehicle officers discovered four prosthetic face masks similar to the one COLLETTI was believed to have been wearing inside the casinos while making cash withdrawals. In the back seat of the vehicle was a straw hat with a black ribbon, matching the one worn by COLLETTI on May 24, 2019, while making withdrawals from victim accounts inside MGM Grand Casino Detroit. Also found were numerous articles of clothing, cell phones, flash drives, computer tablets, a counterfeit \$100 bill, books on how to get away with committing crime, surgical masks, a briefcase and paint cans (themselves containing various ID cards). In total there were eighty-three (83) driver's licenses, fourteen (14) insurance cards in multiple names, six (6) open water diver certification cards, two (2) Binghamton University staff ID cards, nineteen (19) players cards from various casinos (the majority from MGM Grand Casino), and one social security card under an alias, Michael Harris. A NCIC check conducted by Prairie Band Potawatomi Tribal

Police reveled negative results, indicating that Michael Harris is a synthetic identity and alias created and used by COLLETTI.

24. According to Prairie Band Potawatomi Tribal Police reports, during the search of the black Nissan Versa, Oklahoma license plate ICV528, multiple USB flash drives were found. Officers reviewed the contents of the USB flash drives, which included: forgery documents, background checks on various individuals, tutorials and manuals on how to counterfeit money and commit various other financial crimes, videos of GPKs inside the MGM Grand Casino Detroit, handwritten signatures, and excel spreadsheets with over one thousand names. The spreadsheets containing the names of individuals also included each person's associated personal identifying information to include date of birth, social security number, phone number, address, place of work, bank routing numbers, bank account numbers, and monthly salary.

25. Additionally, located on one of the USB flash drives were documents detailing the fraudulent transactions completed by COLLETTI in April and May 2019 at the MGM Grand Casino Detroit—each victim's PII, the attempted amounts withdrawn from their accounts and how much COLLETTI was successful in withdrawing. COLLETTI also had reports for many of the victims, ordered from the website Beenverified.com, which

included phone numbers for the victims. There were also copies of orders COLLETTI placed with as-yet-unidentified individuals, in which COLLETTI attempted to order the victims' social security numbers. COLLETTI also had photos of himself trying on prosthetic masks.

26. Also located inside a briefcase collected during the search of COLLETTI's rental vehicle was a list of casinos, some with stars next to the casino's name. Further research conducted by Prairie Band Potawatomi Tribal Police identified the casinos with stars as being casinos containing GPKs.
27. According to Prairie Band Potawatomi Tribal Police, also located inside COLLETTI's rented black Nissan Versa, Oklahoma license plate ICV528, were numerous GPK receipts, credit cards, IDs and documents containing either COLLETTI's true name, or known aliases. Three of these receipts were for the rental payment for storage unit #1091 located at National Storage Centers at 1100 Oakman Street, Detroit, Michigan.
28. A federal search warrant executed on storage unit #1091 revealed duplicate copies of forty-eight (48) of the driver's licenses found in in COLLETTI's rental vehicle, over 250 GPK receipts from MGM Grand Detroit, a box for a mobility walker, and mannequin heads used to display prosthetic facemasks.
29. At the time of his arrest, COLLETTI identified himself as JOHN COLLETTI and provided a date of birth to the arresting officers. Found

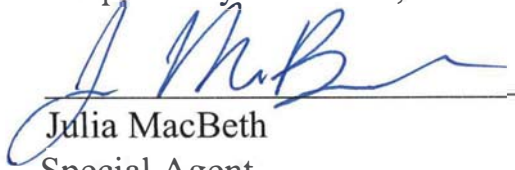
during the search of COLLETTI's rental vehicle, was a valid State of Michigan driver's license which was determined to be COLLETTI's legitimate driver's license by the Potawatomi Tribal Police. The information on the card was verified by the State of Michigan and the photo retrieved from the State of Michigan for COLLETTI matched the subject in custody. The date of birth also matched the date of birth provided by COLLETTI. Also, in the vehicle was COLLETTI's valid United States passport. Law enforcement database checks show COLLETTI as having residency in Michigan since 1988.

CONCLUSION

30. Based on the investigation thus far, including the facts set forth above, your affiant submits that there is probable cause to believe that JOHN CHRISTOPHER COLLETTI, caused the interstate transmission of information via wire in the course of executing a scheme to defraud; and while doing so knowingly possessed and used, without lawful authority, a means of identification of another person. In addition, your affiant submits that there is probable cause to believe that COLLETTI possessed fifteen or more access devices that were counterfeit or unauthorized access devices, and did so knowingly and with intent to defraud.

31. Therefore, your affiant believes that probable cause exists that JOHN CHRISTOPHER COLLETTI violated Title 18, U.S.C. §1343 (Wire Fraud); Title 18, U.S.C. §1028A (Aggravated Identity Theft); and Title 18, U.S.C. §1029(a)(3) (Fraud and Related Activity in Connection with Access Devices).

Respectfully submitted,



Julia MacBeth
Special Agent
Federal Bureau of Investigation

Date: July 17, 2020

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Anthony P. Patti
United States Magistrate Judge